

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**  
Case No.: 1:23-cv-20727-RKA

**RYAN BRESLOW, et al.,**

Plaintiffs,

v.

**MARK PHILLIPS, et al.,**

Defendants.

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**MOVEMENTDAO, et al.,**

Counterclaim-Plaintiffs,

v.

**RYAN BRESLOW, et al.,**

Counterclaim-Defendants.

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**DEFENDANT AND COUNTERCLAIM-PLAINTIFF MARK PHILLIPS AND  
COUNTERCLAIM-PLAINTIFF MOVEMENTDAO'S UNOPPOSED MOTION TO  
EXTEND BRIEFING SCHEDULE FOR BOTH SIDES ON PLAINTIFFS AND  
COUNTERCLAIM-DEFENDANTS' FORTHCOMING MOTION TO DISMISS  
COUNTERCLAIM**

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Pursuant to S.D. Fla. L.R. 7.1, Defendant and Counterclaim-Plaintiff Mark Phillips and Counterclaim-Plaintiff MovementDAO (collectively, “Counterclaim-Plaintiffs”) hereby move for a mutual extension of the briefing schedule for Plaintiffs Ryan Breslow, Alex Fine, and Jon Gordon’s (collectively, “Counterclaim-Defendants”) forthcoming motion to dismiss Counterclaim-Plaintiffs’ Counterclaim, which Counterclaim-Plaintiffs understand Counterclaim-Defendants will be filing on June 30, 2023.

Specifically, Counterclaim-Plaintiffs request that they be permitted to file a memorandum of law in opposition to the anticipated motion to dismiss twenty-eight (28) days after the filing of the motion, and that Counterclaim-Defendants be permitted to file a reply memorandum fourteen (14) days after the filing of the opposition memorandum.

Pursuant to Local Rule 7.1(A)(3), I hereby certify that counsel for Counterclaim-Plaintiffs conferred with counsel for Counterclaim-Defendants regarding the relief requested herein. This motion is unopposed by Counterclaim-Defendants.

Respectfully submitted,

/s/ Nitoj P. Singh

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Reed; and Counterclaim-Plaintiff  
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